

ALEX G. TSE (CABN 152348)  
United States Attorney

BARBARA J. VALLIERE (DCBN 439353)  
Chief, Criminal Division

MICHAEL G. PITMAN (DCBN 484164)  
Assistant United States Attorney, Tax Division  
150 Almaden Boulevard, Suite 900  
San Jose, CA 95113  
Telephone: (408) 535-5040  
Facsimile: (408) 535-5081  
Email: michael.pitman@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSE SANCHEZ FLORES,  
  
Defendant.

Case No. 5:17-cr-00506-BLF

STIPULATION AND [PROPOSED] ORDER  
EXCLUDING TIME

The Defendant Jose Sanchez Flores and the government, by and through undersigned counsel, appeared before the Court on November 20, 2018 at 9:00 AM for a status conference. The matter was set for trial on April 22, 2019 at 9:00 AM. Counsel for the Defendant requested that time be excluded under the Speedy Trial Act between November 20, 2018 and April 22, 2019 in order to review discovery and conduct necessary investigation. The government has no objection.

Accordingly, Defendant and the United States hereby STIPULATE and AGREE that time under the Speedy Trial Act be excluded from November 20, 2018 and April 22, 2019 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) to allow for effective preparation of counsel, taking into account the exercise of due diligence.

1 Respectfully submitted,

2 ALEX G. TSE  
United States Attorney

3 s/ Michael G. Pitman  
4 MICHAEL G. PITMAN  
Assistant United States Attorney

5 Attorneys for United States of America

6  
7 s/ Natalie Nabizada  
NATALIE NELOFAR NABIZADA  
8 The Litigation Law Group  
111 N Market St., Suite 1010  
9 San Jose, CA 95113  
(949) 656-1530  
10 Email: natalien@thellg.com

11 Attorney for Defendant Jose Sanchez Flores

12  
13  
14 [PROPOSED] ORDER

15 Pursuant to the Stipulation of Defendant Jose Sanchez Flores and the United States, the  
16 representations of counsel, and for good cause shown, the Court finds that failing to exclude the time  
17 between November 20, 2018 and April 22, 2019 would unreasonably deny Defendant continuity of  
18 counsel and would deny counsel the reasonable time necessary for effective preparation, taking into  
19 account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the  
20 ends of justice served by excluding the time between November 20, 2018 and April 22, 2019 from  
21 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a  
22 speedy trial. Therefore, IT IS HEREBY ORDERED that the time between November 20, 2018 and  
23 April 22, 2019 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
24 3161(h)(7)(A) and (B)(iv).

25  
26 DATED: \_\_\_\_\_

27 THE HONORABLE BETH LABSON FREEMAN  
UNITED STATES DISTRICT JUDGE